

EXHIBIT A

Jerry Maroules, Esq. - ID#023261983
AGRAPHIDIS & MAROULES, P.C.
777 Terrace Avenue, Suite 504
Hasbrouck Heights, New Jersey 07604
(201)288-0500
ATTORNEYS FOR PLAINTIFF

Ida Padilla,

Plaintiffs,

V.

Walmart of Kearny
AND JOHN DOE I-III,

Defendants.

:SUPERIOR COURT OF NEW JERSEY
:LAW DIVISION: HUDSON COUNTY

:DOCKET NO:

: CIVIL ACTION

COMPLAINT AND JURY DEMAND

Plaintiff, Ida Padilla, residing in the City of Kearny, in the County of Hudson, and State of New Jersey, by way of Complaint against the defendant, hereby alleges and says:

FIRST COUNT

1. At all times hereinafter mentioned, plaintiff, Ida Padilla, was a lawful business invitee on defendant's premises at Walmart of Kearny located in the Town of Kearny, County of Hudson, and State of New Jersey on May 25, 2019.

2. Upon information and belief, plaintiff, Ida Padilla, slipped and fell due to a dangerous and hazardous condition, to wit, plastic wrapping and debris on the floor at the Walmart of Kearny, which is located in the City of Kearny, in the County of Hudson, and in the State of New Jersey on May 25, 2019.

3. Upon information and belief, defendant, Walmart of Kearny, jointly and/or severally, is responsible for the maintenance and management of their store, located at in the Town of Kearny, Hudson County, New Jersey.

4. Upon information and belief, and in the alternative to the allegations in paragraphs 2 & 3 above, the true name of capacity, whether individual, plural, corporate, partnership, associate or otherwise of defendants, JOHN DOE I-III, are unknown to plaintiff,

who, therefore, brings suit against said defendants by such fictitious name. JOHN DOE I-III may be the true owner or operator or party responsible for the maintenance of the Walmart of Kearny, located at in the Town of Kearny, County of Hudson and State of New Jersey on May 25, 2019, and is responsible for any dangerous conditions on the premises, for the maintenance and repair of the premises and well-being of plaintiff, Ida Padila, but the full extent of those facts linking the fictitiously designated defendant with the cause of action alleged herein is unknown to plaintiff at this time.

5. As a direct and proximate result of the negligence of the defendants, Walmart of Kearny and John Doe I-III, its agents, servants, and/or employees, in the manner in which said premises were maintained and cleaned, the plaintiff, Ida Padilla, was caused to fall and sustain serious injury causing her to suffer great pain and will in the future be caused to suffer great pain; she was caused to incur medical expenses and will in the future be caused to incur medical expenses; she was caused to suffer permanent injury.

6. Upon information and belief, defendants had actual and/or constructive notice of the dangerous condition described above and failed to remedy this dangerous condition, take precautionary steps to prevent the accident, or give notice to those in the area thereby breaching their duty of care to plaintiff.

WHEREFORE, the plaintiff, Ida Padilla, demands judgment against the defendants, Walmart of Kearny and John Doe I-III, jointly and severally for damages, pain and suffering and infliction of emotional distress, together with attorney's fees, interest, costs of suit and any other relief the Court deems just and equitable.

AGRAPIDIS & MAROULES, P.C.
Attorneys for Plaintiff

BY:


EVANS C. AGRAPIDIS, ESQ.

DATED: 9/17, 2020

DEMAND FOR TRIAL BY JURY

Plaintiff hereby demands a trial by jury as to all issues raised in the Complaint.

AGRAPIDIS & MAROULES, P.C.
Attorneys for Plaintiff

BY: 
EVANS C. AGRAPIDIS, ESQ.

DATED: 9/17, 2020

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Jerry Maroules, Esq. (ID#023261983), is hereby designated as Trial Counsel of this matter.

AGRAPIDIS & MAROULES, P.C.
Attorneys for Plaintiff

BY: 
EVANS C. AGRAPIDIS, ESQ.

DATED: 9/17, 2020

CERTIFICATION

I certify that pursuant to R. 4:5-1, to my knowledge and based on the information available to me at this time, the matter in controversy is not the subject of any other action pending in any Court, or of a pending arbitration proceeding and that no additional parties are known at this time who should be added.

AGRAPIDIS & MAROULES, P.C.
Attorneys for Plaintiff

BY: 
EVANS C. AGRAPIDIS, ESQ.

DATED: 9/17, 2020

DEMAND FOR ANSWERS TO INTERROGATORIES

Pursuant to R. 4:17-1(b), the plaintiff hereby demands that the defendant provide answers to the Uniform Interrogatories set forth in Form C and C(2) of Appendix II of the Rules Governing the Courts of the State of New Jersey.

AGRAPIDIS & MAROULES, P.C.
Attorneys for Plaintiff

BY: 
EVANS C. AGRAPIDIS, ESQ.

DATED: 9/17, 2020

Civil Case Information Statement

Case Details: HUDSON | Civil Part Docket# L-003393-20

Case Caption: PADILLA IDA VS WALMART OF KEARNY

Case Initiation Date: 09/22/2020

Attorney Name: JERRY A MAROULES

Firm Name: AGRAPIDIS & MAROULES, PC

Address: 777 TERRACE AVE STE 504

HASBROUCK HGTS NJ 076040000

Phone: 2012880500

Name of Party: PLAINTIFF : Padilla, Ida

Name of Defendant's Primary Insurance Company

(if known): Unknown

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Are sexual abuse claims alleged by: Ida Padilla? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

09/22/2020

Dated

/s/ JERRY A MAROULES

Signed

IDA PADILLA

Plaintiff

20200922130525

VS

Superior Court Of New Jersey

WALMART OF KEARNY, ET AL

Defendant

HUDSON Venue

Docket Number: HUD L 3393 20

Person to be served (Name and Address):

WALMART OF KEARNY
150 HARRISON AVENUE
KEARNY NJ 07032

By serving: WALMART OF KEARNY

Attorney: EVANS C. AGRAPIDIS, ESQ.

Papers Served: SUMMONS AND COMPLAINT, CIS, DEMAND,
CERTIFICATION

AFFIDAVIT OF SERVICE

(For Use by Private Service)

Cost of Service pursuant to R. 4:4-3(c)

\$ _____

Service Data: ☒ Served Successfully ☐ Not Served

Date/Time: 9/23/2020 1:30 PM

☐ Delivered a copy to him/her personally

☐ Left a copy with a competent household member over 14 years of age
residing therein (indicate name & relationship at right)

☒ Left a copy with a person authorized to accept service, e.g. managing agent,
registered agent, etc. (indicate name & official title at right)

Name of Person Served and relationship/title:

KATIE VALAZQUEZ

MANAGING AGENT

Description of Person Accepting Service:

SEX: F AGE: 21-35 HEIGHT: 5'0"-5'3" WEIGHT: 131-160 LBS. SKIN: WHITE HAIR: BROWN OTHER: _____

Unserved:

- ☐ Defendant is unknown at the address furnished by the attorney
☐ All reasonable inquiries suggest defendant moved to an undetermined address
☐ No such street in municipality
☐ Defendant is evading service
☐ Appears vacant
☐ No response on:

Date/Time: _____
Date/Time: _____
Date/Time: _____

Other: _____

Served Data:

Subscribed and Sworn to me this

24 day of Sept, 20 20

Notary Signature: _____

KIMBERLY GROTE

NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Dec. 18, 2023

I, MARK SACRIPANTI

was at the time of service a competent adult, over the age
of 18 and not having direct interest in the litigation. I declare
under penalty of perjury that the foregoing is true and
correct.

Signature of Process Server

9/24/2020
Date

Name of Private Server: MARK SACRIPANTI Address: 2009 Morris Avenue UNION, NJ 07083 Phone: (800) 672-1952

HUDSON COUNTY SUPERIOR COURT
HUDSON COUNTY
583 NEWARK AVENUE
JERSEY CITY NJ 07306

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (201) 748-4400
COURT HOURS 8:30 AM - 4:30 PM

DATE: SEPTEMBER 22, 2020
RE: PADILLA IDA VS WALMART OF KEARNY
DOCKET: HUD L -003393 20

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON MARYBETH ROGERS

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002
AT: (201) 748-4400.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: JERRY A. MAROULES
AGRAPIDIS & MAROULES, PC
777 TERRACE AVE
STE 504
HASBROUCK HGTS NJ 07604

ECOURTS

EXHIBIT B

D'ARCAMBAL OUSLEY & CUYLER BURK, LLP

Four Century Drive | Suite 250

Parsippany, New Jersey 07054

Tel.: 973.734.3200

Fax: 973.734.3201

Email: npeters@darcambal.com

By: Nada M. Peters, Esq. (NJ Att. Id. 027942004)

Attorneys for Defendant, Wal-Mart Stores East, LP

(improperly pled as Walmart of Kearny)

IDA PADILLA,

Plaintiff,

vs.

WALMART OF KEARNY AND JOHN DOE I-III,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: HUDSON COUNTY

DOCKET NO.: HUD-L-003393-20

**ANSWER TO COMPLAINT,
AFFIRMATIVE DEFENSES, JURY
DEMAND, DEMAND FOR
RESPONSES TO
INTERROGATORIES, DEMAND FOR
STATEMENT OF DAMAGES AND
CERTIFICATION PURSUANT TO R.
4:5-1(b)(2)**

Defendant, Wal-Mart Stores East, LP (improperly pled as Walmart of Kearny) (“Defendant”), by way of Answer to the Complaint of Plaintiff, Ida Padilla (“Plaintiff”), by and through its attorneys, d’Arcambal Ousley & Cuyler Burk, LLP, says:

FIRST COUNT

1. Defendant admits only that Wal-Mart Stores East, LP operates a retail store located at 150 Harrison Ave, Kearny, New Jersey. Except as herein specifically admitted, Defendant denies the remaining allegations of paragraph 1 of the Complaint.

2. To the extent the allegations of paragraph 2 of the Complaint are narrative and/or assert legal conclusions, no response is required thereto and the allegations are deemed denied. To the extent the allegations purport to impute liability to Defendant, they are denied.

3. Defendant admits only that Wal-Mart Stores East, LP operates a retail store located at 150 Harrison Ave, Kearny, New Jersey. To the extent the remaining allegations of paragraph 3 of the Complaint are narrative and/or assert legal conclusions, no response is required thereto and the allegations are deemed denied. To the extent the remaining allegations purport to impute liability to Defendant, they are denied.

4. To the extent the allegations of paragraph 4 of the Complaint are directed to other defendants and/or are narrative and/or assert legal conclusions, Defendant makes no response thereto and the allegations are deemed denied. To the extent the allegations of paragraph 4 of the Complaint purport to impute liability to Defendant, they are denied.

5. To the extent the allegations of paragraph 5 of the Complaint are directed to other defendants and/or are narrative and/or assert legal conclusions, Defendant makes no response thereto and the allegations are deemed denied. To the extent the allegations of paragraph 5 of the Complaint purport to impute liability to Defendant, they are denied.

6. To the extent the allegations of paragraph 6 of the Complaint are directed to other defendants and/or are narrative and/or assert legal conclusions, Defendant makes no response thereto and the allegations are deemed denied. To the extent the allegations of paragraph 6 of the Complaint purport to impute liability to Defendant, they are denied.

WHEREFORE, Defendant, Wal-Mart Stores East, LP (improperly pled as Walmart of Kearny), denies that Plaintiff is entitled to the relief requested in the Complaint, and requests that

the Complaint be dismissed with prejudice, and that Defendant be awarded attorneys' fees, costs of suit and such other relief as the Court deems just.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

The injuries and damages claimed are the result of the sole negligence of the Plaintiff.

SECOND AFFIRMATIVE DEFENSE

The injuries and damages claimed are the result of the contributory negligence of the Plaintiff, which negligence is greater than that of Defendant, or alternatively, Plaintiff's damages, if any, are reduced by the percentage of Plaintiff's comparative negligence and the Comparative Negligence Act, *N.J.S.A. § 2A:15-5.1, et seq.*

THIRD AFFIRMATIVE DEFENSE

The injuries and damages claimed are the result of the negligence of third parties over which Defendant has no control.

FOURTH AFFIRMATIVE DEFENSE

The Complaint fails to set forth a cause of action upon which relief may be granted and Defendant reserves the right to move before or at the time of trial to dismiss same.

FIFTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred or otherwise reduced by operation of the doctrine of avoidable consequences.

SIXTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred or otherwise reduced by operation of the doctrine of mitigation of damages.

SEVENTH AFFIRMATIVE DEFENSE

Plaintiff assumed the risk and was fully cognizant of any and all circumstances surrounding the alleged incident.

EIGHTH AFFIRMATIVE DEFENSE

Defendant did not proximately cause any damage to Plaintiff.

NINTH AFFIRMATIVE DEFENSE

Defendant denies that it was negligent in any way.

TENTH AFFIRMATIVE DEFENSE

Defendant did not breach any duty owed to Plaintiff.

ELEVENTH AFFIRMATIVE DEFENSE

The alleged injuries and damages complained of by Plaintiff were due to unavoidable circumstances and causes beyond the control or fault of Defendant.

TWELFTH AFFIRMATIVE DEFENSE

At all times relevant, Defendant complied with all applicable laws, regulations and standards.

THIRTEENTH AFFIRMATIVE DEFENSE

The Complaint is subject to dismissal for insufficient service of process on Defendant.

FOURTEENTH AFFIRMATIVE DEFENSE

Plaintiff's injuries and damages, if any, were proximately caused by intervening, superseding causes, and not by Defendant's negligence.

FIFTEENTH AFFIRMATIVE DEFENSE

Defendant is entitled to a credit or set-off with respect to any collateral payments made to Plaintiff for injuries allegedly incurred pursuant to *N.J.S.A.* § 2A:15-97, including but not limited to, any medical bills or costs paid or reduced by health insurance coverage.

SIXTEENTH AFFIRMATIVE DEFENSE

Defendant reserves the right to amend its answer and/or assert additional defenses and/or supplement, alter and/or change its answer upon revelation of more definite facts by Plaintiff in completion of further discovery.

WHEREFORE, Defendant, Wal-Mart Stores East, LP (improperly pled as Walmart of Kearny), denies that Plaintiff is entitled to the relief requested in the Complaint, and requests that the Complaint be dismissed with prejudice, and that Defendant be awarded attorneys' fees, costs of suit and such other relief as the Court deems just.

Dated: December 18, 2020

/s/ Nada M. Peters

Nada M. Peters, Esq. (NJ Att. Id. 027942004)

**D'ARCAMBAL OUSLEY & CUYLER
BURK, LLP**

Four Century Drive | Suite 250

Parsippany, New Jersey 07054

Tel.: 973.734.3200

Fax: 973.734.3201

Email: npeters@darcambal.com

Attorneys for Defendant, Wal-Mart Stores East,
LP (improperly pled as Walmart of Kearny)

JURY DEMAND

Defendant, Wal-Mart Stores East, LP (improperly pled as Walmart of Kearny), hereby demands a trial by jury on all issues triable by a jury.

Dated: December 18, 2020

/s/ Nada M. Peters

Nada M. Peters, Esq. (NJ Att. Id. 027942004)

**D'ARCAMBAL OUSLEY & CUYLER BURK,
LLP**

Four Century Drive | Suite 250

Parsippany, New Jersey 07054

Tel.: 973.734.3200

Fax: 973.734.3201

Email: npeters@dacambal.com

Attorneys for Defendant, Wal-Mart Stores East, LP
(improperly pled as Walmart of Kearny)

DESIGNATION OF TRIAL COUNSEL

In accordance with Rule 4:25-4, Defendant hereby designates Nada Peters as trial counsel
in this action.

Dated: December 18, 2020

/s/ Nada M. Peters

Nada M. Peters, Esq. (NJ Att. Id. 027942004)

**D'ARCAMBAL OUSLEY & CUYLER
BURK, LLP**

Four Century Drive | Suite 250

Parsippany, New Jersey 07054

Tel.: 973.734.3200

Fax: 973.734.3201

Email: npeters@dacambal.com

Attorneys for Defendant, Wal-Mart Stores East,
LP (improperly pled as Walmart of Kearny)

RULE 4:5-2 DEMAND FOR STATEMENT OF DAMAGES

Pursuant to Rule 4:5-2, Defendant, Wal-Mart Stores East, LP (improperly pled as Walmart,
Inc.), demands that Plaintiff provides a written statement of her claimed damages within five days
from the date hereof.

Dated: December 18, 2020

/s/ Nada M. Peters

Nada M. Peters, Esq. (NJ Att. Id. 027942004)

**D'ARCAMBAL OUSLEY & CUYLER
BURK, LLP**

Four Century Drive | Suite 250

Parsippany, New Jersey 07054
Tel.: 973.734.3200
Fax: 973.734.3201
Email: npeters@darcambal.com
Attorneys for Defendant, Wal-Mart Stores East,
LP (improperly pled as Walmart of Kearny)

DEMAND FOR ANSWERS TO INTERROGATORIES

Defendant, Wal-Mart Stores East, LP (improperly pled as Walmart of Kearny), demands that Plaintiff provide written answers to Uniform Interrogatories as set forth in Appendix II of the New Jersey Court Rules.

Dated: December 18, 2020

/s/ Nada M. Peters
Nada M. Peters, Esq. (NJ Att. Id. 027942004)
**D'ARCAMBAL OUSLEY & CUYLER
BURK, LLP**
Four Century Drive | Suite 250
Parsippany, New Jersey 07054
Tel.: 973.734.3200
Fax: 973.734.3201
Email: npeters@darcambal.com
Attorneys for Defendant, Wal-Mart Stores East,
LP (improperly pled as Walmart of Kearny)

RULE 4:5-1 CERTIFICATION

I hereby certify that to the best of my knowledge, information, and belief, the within matter in controversy is not the subject of any other pending or contemplated court actions or arbitration proceedings.

I further certify that to the best of my knowledge, information, and belief, I am not aware of any non-parties who should be joined in the action.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: December 18, 2020

/s/ Nada M. Peters

Nada M. Peters, Esq. (NJ Att. Id. 027942004)

**D'ARCAMBAL OUSLEY & CUYLER
BURK, LLP**

Four Century Drive | Suite 250

Parsippany, New Jersey 07054

Tel.: 973.734.3200

Fax: 973.734.3201

Email: npeters@darcambal.com

Attorneys for Defendant, Wal-Mart Stores East,
LP (improperly pled as Walmart of Kearny)

CERTIFICATION OF SERVICE

I HEREBY CERTIFY that I have caused the within pleading to be electronically filed through the Judiciary's ECourt application with the Superior Court, Hudson County, New Jersey, and that a copy of this pleading has been served electronically upon the following counsel and a courtesy copy has also been submitted to counsel via Email:

Jerry Maroules, Esq.
AGRAPIDIS & MAROULES, P.C.
777 Terrace Avenue, Suite 504
Hasbrouck Heights, NJ 07604
E-mail: j.maroules@amlawnj.com
Attorney for Plaintiff, Ida Padilla

Dated: December 18, 2020

/s/ Nada M. Peters

Nada M. Peters, Esq.

Civil Case Information Statement

Case Details: HUDSON | Civil Part Docket# L-003393-20

Case Caption: PADILLA IDA VS WALMART OF KEARNY

Case Initiation Date: 09/22/2020

Attorney Name: NADA MAALOUF PETERS

Firm Name: D'ARCAMBAL OUSLEY & CUYLER BURK LLP

Address: PARSIPPANY CORPORATE CTR FOUR

CENTURY DR, STE 250

PARSIPPANY NJ 070544663

Phone: 9737343285

Name of Party: DEFENDANT : WALMART OF KEARNY

Name of Defendant's Primary Insurance Company

(if known): None

Case Type: PERSONAL INJURY

Document Type: Answer

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Are sexual abuse claims alleged by: IDA PADILLA? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

12/18/2020

Dated

/s/ NADA MAALOUF PETERS

Signed

D'ARCAMBAL OUSLEY & CUYLER BURK, LLP

Four Century Drive | Suite 250

Parsippany, New Jersey 07054

Tel.: 973.734.3200

Fax: 973.734.3201

Email: npeters@darcambal.com

By: Nada M. Peters, Esq.

Attorneys for Defendant, Wal-Mart Stores East, LP

(improperly pled as Walmart of Kearney)

FILED

DECEMBER 16, 2020

MARYBETH ROGERS, J.S.C.

IDA PADILLA,

Plaintiff,

vs.

WALMART OF KEARNY AND JOHN DOE I-III,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: HUDSON COUNTY

DOCKET NO.: HUD-L-003393-20

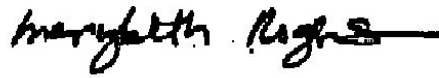
**CONSENT ORDER PERMITTING
DEFENDANT WAL-MART STORES
EAST, LP TO FILE AN ANSWER**

This matter having come before the Court on the consent of d'Arcambal Ousley & Cuyler Burk LLP, attorneys for Defendant, Wal-Mart Stores East, LP (improperly pled as Walmart of Kearny), and Agrapidis & Maroules, P.C., attorneys for Plaintiff, Ida Padilla, in connection with the above matter, for an Order extending Defendant, Wal-Mart Stores East, LP's, time to Answer the Complaint through and including December 18, 2020, and counsel for all parties having indicated consent hereto, and good cause having been shown,

It is on this 16TH day of December, 2020,

ORDERED that:

1. Defendant, Wal-Mart Stores East, LP (improperly pled as Walmart of Kearney) shall file its Answer to the Complaint on or before December 18, 2020.



The Honorable Marybeth Rogers

Consented to by:

/s/ Nada M. Peters

Nada M. Peters, Esq.

D'ARCAMBAL OUSLEY & CUYLER BURK, LLP

Attorneys for Defendant, Wal-Mart Stores East, LP

(improperly pled as Walmart of Kearny)

/s/ Jerry Maroules

Jerry Maroules, Esq.

AGRAPIDIS & MAROULES, P.C.

Attorneys for Plaintiff, Ida Padilla

EXHIBIT C

Jerry Maroules, Esq.
AGRAPIDIS & MAROULES, P.C.
777 Terrace Avenue, Suite 504
Hasbrouck Heights, New Jersey 07604
(201)288-0500
ATTORNEYS FOR PLAINTIFF

Ida Padilla,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION: HUDSON COUNTY
	:	
Plaintiffs,	:	DOCKET NO: HUD-L-3393-20
	:	
V.	:	CIVIL ACTION
	:	
	:	
Walmart of Kearny	:	
AND JOHN DOE I-III,	:	
	:	
Defendants.	:	

STATEMENT OF DAMAGES

TO: **Nada M. Peters, Esq.**
D'Arcambal Ousley & Cuyler Burk, LLP
Four Century Drive
Suite 250
Parsippany, NJ 07054
ATTORNEYS FOR DEFENDANT, Wal-Mart Stores East, LP

Plaintiff seeks damages in the amount of TWO-HUNDRED FIFTY THOUSAND DOLLARS (\$250,000.00).

AGRAPIDIS & MAROULES, P.C.

DATED: January 13, 2021

By:


JERRY MAROULES, ESQ.